



COLORADO
DEPARTMENT
OF HEALTH

4210 East 11th Avenue
Denver, Colorado 80220-3716
Phone (303) 320-8333

Hazardous Materials and
Waste Management Division
Telefax Number: (303) 331-4401

Telefax Numbers
Main Building/Denver
(303) 322-9076

Ptarmigan Place/Denver
(303) 320-1529

First National Bank Building/Denver
(303) 355-6559

Grand Junction Office
(303) 248-7198

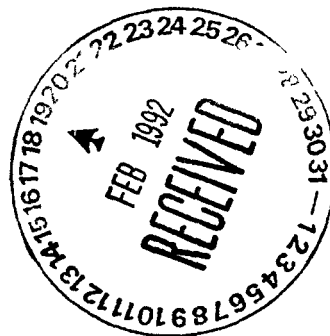
Pueblo Office
(719) 543-8441

ROY ROMER
Governor

JOEL KOHN
Interim Executive Director

February 10, 1992

Mr. Frazer Lockhart
U. S. Department of Energy
Rocky Flats Office
P.O. Box 928
Golden, Colorado 80402-0928



RE: OU 13 Phase I RFI/RI Workplan

Dear Mr. Lockhart,

We are in receipt of your February 5, 1992, letter (92-DOE-1406) concerning the field visit to OU 13 conducted by DOE, EG&G, EPA, CDH, and contractor staff. We agree that a field sampling plan that differs from Table 5 in the IAG makes sense and is, at certain IHSSs, logistically necessary. However, the Division would like to emphasize a couple of items.

First, at this point, only a Phase I investigation is anticipated for this operable unit. The Division has previously provided guidance on the proper scope of Phase I RFI/RI in non-RCRA closure operable units (CDH, September 19, 1991). In summary, this guidance states that a Phase I investigation will make an effort to determine the sampling necessary to 1) address all possible risk assessment pathways and 2) establish all of the parameters set forth in Section VII of the IAG Statement of Work concerning RFI/RI reports.

Second, the Division would like to see the workplan structured in a "staged" manner. Implementing the sampling in stages allows each subsequent stage to benefit from data gathered and lessons learned in previous stages. Practically, an example of how the workplan may be impacted is that the location, type, and number of monitoring wells at a given IHSS will be difficult to determine until all other planned sampling is concluded. Preliminary discussions of these types of ideas occurred on the field visit between agency, contractor, and DOE staff. In addition, as has been extensively discussed, accessibility will play a major role in determining sample numbers and locations. Please refer to the attached table for our initial compilation of how this may impact the FSP for the OU 13 Workplan.

ADMIN RECORD

A-OU13-000003

The Division greatly appreciated the field visit and the time DOE and EG&G personnel contributed to our understanding of the OU. We hope that this letter can further the process of formulating a good workplan. If you have any questions regarding these matters, please call Joe Schieffelin of my staff at 331-4421.

Sincerely,



Gary W. Baughman
Unit Leader, Hazardous Waste Facilities
Hazardous Materials and Waste Management Division

cc: Bob Birk, DOE
Eric Dille, EG&G
Paul Bunge, EG&G
Martin Hestmark, EPA
Barbara Barry, RFPU